The above Amendments and these Remarks are in reply to the Office action mailed September 18, 2007. Applicants have amended claims 1-2, 4-6, 11, 14, 16 and 19-20, and have canceled claims 3, 8 and 12-13 and 15. Claims 23-26 have been withdrawn.

I.   RESPONSE TO REJECTIONS UNDER 35 U.S.C. §102

Claims 1-5 were rejected under 35 U.S.C. §102(e) as being anticipated by *Gropper* U.S. Patent No. 6,883,000 ("*Gropper*").

Claims 7-10 were rejected under 35 U.S.C.§102(b) as being anticipated by *Gehani, et al.*, U.S. Patent No. 5,946,687 ("*Gehani, et al*".).

Claims 11, 15, 16, 21 and 22 were rejected under 35 U.S.C. §102(b) as being anticipated by *Beauregard, et al.*, U.S. Patent No. 5,974,413 ("*Beauregard, et al.*").

A.   *Gropper*

Claim 1, in part, recites:

"identifying, in the electronic document, a string having a unique identifier associated with the string, wherein the unique identifier indicates the type of reference material source that will contain information associated with the string;"

The Examiner refers to the Universal Contact Locator (UCL) disclosed in *Gropper* as a "unique identifier." Regardless, *Gropper* does not teach that the UCL "indicates the type of reference material source that will contain information associated with the string." The UCL disclosed in *Gropper* is a "unique alpha numeric identifier." Col. 4, line 45. The example of a UCL provided by *Gropper* is an email address. Col. 4, line 47. An alpha numeric identifier cannot indicate "the type of reference material source that will contain information associated with the string." Therefore, Applicants respectfully suggest that the method recited in claim 1 is not anticipated by *Gropper*, and request that the Examiner remove this rejection.

Applicants have canceled claim 3. Remaining dependent claims 2 and 4-5 depend directly or indirectly from independent claim 1. These dependent claims include all of the limitations of the

independent claim from which they depend. Applicants respectfully assert that dependent claims 2 and 4-5 are allowable for at least the reasons set forth above concerning independent claim 1.

B. *Gehani*

Claim 7, in part, recites:

> "creating a request for information requesting directions to the destination, wherein the request for information includes the identity of the user;
>
> selecting a reference material source based upon the request for information;
>
> accessing the selected reference material source to obtain the directions to the destination, wherein the directions are based in part on the identity of the user; and
>
> providing the directions to the destination to the user, wherein the directions to the destination begin where the user is geographically located."

The geo-enabled personal information manager (PIM) described in *Gehani* does not teach "creating a request for information requesting directions to the destination, wherein the request for information includes the identity of the user." In contrast, *Gehani* teaches that a user must manually enter in the user's address in order to receive directions to a destination. *Gehani*, col. 5, lines 24-37. For example, in *Gehani*, the user enters a contact (e.g., U.S. Patent & Trademark Office) and clicks the DIRECTIONS button 62 in the display 50. According to *Gehani*, the Geoserver 20:

> Interacts with the user to obtain a second address. The GeoServer 20 first asks the user if the address A is the start address or the end address of the required route. If address A is the start address, the user is requested to supply the end address. Otherwise, the user is requested to supply the start address. [Col. 5, lines 29-34.]

Applicants suggest that the user in *Gehani*, by clicking the DIRECTIONS button 62, is "creating a request for information requesting directions to a destination." However, clicking the DIRECTIONS button 62 does not include the identity of the user. Accordingly, the user in *Gehani* must execute several other steps before the directions are available. Therefore, Applicants respectfully suggest that the method recited in claim 7 is not anticipated by *Gehani*, and request that the Examiner remove this rejection.

Applicants canceled claim 8. Remaining dependent claims 9-10 depend directly or indirectly from independent claim 7. These dependent claims include all of the limitations of the independent claim from which they depend. Applicants respectfully assert that dependent claims 9-10 are allowable for at least the reasons set forth above concerning independent claim 7.

C.   *Beauregard*

Claim 11 recites:

> "an application program for creating the electronic document and creating a request for information to obtain the selected reference material, wherein the electronic document includes at least one paragraph having at least one key word, wherein the request for information is created through a prompt provided to the user based on the monitoring of the actions of the user, and wherein the request for information includes the at least one key word; and
>
> a reference engine for receiving the request for information from the application program, selecting one of a plurality of reference material sources based upon the request for information, ~~and~~ accessing the selected reference material source to obtain the selected reference material and providing the selected reference material to the user."

Beauregard does not teach an application program whereby a "request for information is created through a prompt provided to the user based on the monitoring of the actions of the user." In contrast, *Beauregard* discloses technology that allows a user, typing an email, to type a particular company name simply by typing the company's stock symbol. For example, a user may type the ticker symbol "RD" in the email and the *Beauregard* technology will immediately replace the "RD" with "Royal Dutch Petroleum Company." According to *Beauregard*, this name conversion technology is provided by a "Name conversion program from the Active Words web site." Col. 52, lines 7-8. The Name conversion program is a separate third party program dedicated to converting the stock ticker symbols to the company name. The Name conversion program cannot create an "electronic document" or create a "request for information … through a prompt provided to the user based on the monitoring of the actions of the user." Therefore, Applicants respectfully suggest that

the system recited in claim 11 is not anticipated by *Beauregard*, and request that the Examiner remove this rejection.

Dependent claims 15-16 and 21-22 depend directly or indirectly from independent claim 11. These dependent claims include all of the limitations of the independent claim from which they depend. Applicants respectfully assert that dependent claims 15-16 and 21-22 are allowable for at least the reasons set forth above concerning independent claim 11.

II.   RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103

Claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Gropper* in view of *Beauregard, et al.*

Claims 13, 14, 18 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Beauregard, et al.* in view of *Microsoft Outlook 2000 (version 9.0.0.4527; copyrighted 1999)* ("*Outlook*").

Claim 17 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Beauregard, et al.* in view of *Microsoft Word* (*copyright 1999*) ("*MS-WORD*").

Claim 20 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Beauregard, et al.* in view of *Thompson*, U.S. Publication No. 2001/0003183 ("*Thompson*").

Claims 23 and 24 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Thompson* in view of *Wordworks* (*copyright May 1997*) ("*Wordworks*" and further in view of *Uyehara, et al.*, U.S. Patent No. 6,154,214 ("*Uyehara, et al.*").

Claims 25 and 26 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Thompson* in view of *Wordworks* and *Uyehara, et al.* and further in view of *MS-WORD*.

Gropper **in view of** *Beauregard*

The Examiner alleges that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify *Gropper* with the technology disclosed in *Beauregard* to render dependent claim 6 obvious. Dependent claim 6 depends from independent claim 1. Claim 1, in part, recites:

"identifying, in the electronic document, a string having a unique identifier associated with the string, wherein the unique identifier indicates the type of reference material source that will contain information associated with the string;"

For at least the reasons discussed above with regard to *Gropper* (Section I.A) and *Beauregard* (Section I.C), the method recited in claim 1 is also not obvious over *Gropper* in view of *Beauregard*. Namely, the UCL disclosed in *Gropper* is nothing more than a unique user ID that is assigned to each user. When the user logs onto the server system in *Gropper*, the server system flags "the UCL's in the user's UCL summary file representing those subscriber files which contain changed or new contact data." Col. 7, lines 30-35. The UCL disclosed in *Gropper* does not assist the server to find "the type of reference material source that will contain information associated with the string."

One of ordinary skill in the art at the time of the invention could not modify the UCL disclosed in *Gropper* with the technology disclosed in *Beauregard* to create a UCL that "indicates the type of reference material source that will contain information associated with the string." As discussed above, the technology described in *Beauregard* is related to name conversion software. The Name conversion program in *Beauregard* converts stock symbols, when typed by the user, into the full company name (e.g., typing "RD" in an email is immediately converted to "Royal Dutch Petroleum"). The Name conversion software described in *Beauregard* cannot modify the UCL described in *Gropper* such that the UCL will then indicate "the type of reference material source that will contain information associated with the string." Therefore, Applicants respectfully suggest that the method recited in claim 1 is not obvious over the combination of *Gropper* and *Beauregard*. Because claim 6 depends from claim 1, claim 6 is also not obvious over the combination of *Gropper* and *Beauregard*, and Applicants request that the Examiner remove this rejection.

Beauregard* in view of *Outlook

The Examiner alleges that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify *Beauregard* with the technology disclosed by *Outlook* to render dependent claims 13-14 and 18-19 obvious. Applicants canceled claim 13. Remaining dependent claims 14 and 18-19 depend from independent claim 11. Claim 11 recites:

- 11 -

> "an application program for creating the electronic document and creating a request for information to obtain the selected reference material, wherein the electronic document includes at least one paragraph having at least one key word, wherein the request for information is created through a prompt provided to the user based on the monitoring of the actions of the user, and wherein the request for information includes the at least one key word; and
>
> a reference engine for receiving the request for information from the application program, selecting one of a plurality of reference material sources based upon the request for information, accessing the selected reference material source to obtain the selected reference material and providing the selected reference material to the user."

For at least the reasons discussed above with regard to *Beauregard* (Section I.C), the method recited in claim 11 is also not obvious over *Beauregard*. As discussed above, the technology described in *Beauregard* is related to name conversion software. The Name conversion software in *Beauregard* converts stock symbols, when typed by the user, into the full company name (e.g., typing "RD" in an email is immediately converted to "Royal Dutch Petroleum"). The technology described in *Outlook* cannot modify the Name conversion software described in *Beauregard* such that the Name conversion software includes "a reference engine for receiving the request for information from the application program, [and] selecting one of a plurality of reference material sources based upon the request for information." The Name conversion software in *Beauregard* refers to a table of stock symbols and retrieves the corresponding company name. *Outlook* does not include any technology that would provide the Name conversion software the ability to select "one of a plurality of reference material sources based upon the request for information." Therefore, Applicants respectfully suggest that the system recited in claim 11 is not obvious over the combination of *Beauregard* and *Outlook*. Because claims 14 and 18-19 depend from claim 11, claims 14 and 18-19 are also not obvious over the combination of *Beauregard* and *Outlook*, and Applicants request that the Examiner remove this rejection.

Beauregard **in view of** *MS-WORD*

The Examiner alleges that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify *Beauregard* with the technology disclosed by *MS-WORD* to render dependent claim 17 obvious. Dependent claim 17 depends from independent claim 11. For at least the same reasons discussed above with regard to claims 14 and 18-19, the system recited in claim 11 is not obvious over the combination of *Beauregard* and *MS-WORD*. The Examiner cites *MS-WORD* for teaching "automatic detection of language of the application." The automatic language detection taught by *MS-WORD* cannot modify the Name conversion software described in *Beauregard* such that the Name conversion software has ability to select "one of a plurality of reference material sources based upon the request for information."

Moreover, automatic language detection is not related to Name conversion software for converting stock ticker symbols to the company name. Stock ticker symbols are acronyms, not a language. Thus, one of ordinary skill in the art at the time of the invention would not combine the automatic language detection taught by *MS-WORD* with the Name conversion software taught in *Beauregard*. Therefore, Applicants respectfully suggest that the system recited in claim 11 is not obvious over the combination of *Beauregard* and *MS-WORD*. Because claim 17 depends from claim 11, claim 17 is also not obvious over the combination of *Beauregard* and *MS-WORD*, and Applicants request that the Examiner remove this rejection.

Beauregard **in view of** *Thompson*

The Examiner alleges that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify *Beauregard* with the technology disclosed by *Thompson* to render dependent claim 20 obvious. Dependent claim 20 depends from independent claim 11. For at least the same reasons discussed above with regard to *Beauregard* (Section I.C), the system recited in claim 11 is not obvious in view of *Beauregard*. As discussed above, the technology described in *Beauregard* is Name conversion software. The Name conversion software in *Beauregard* converts stock symbols, when typed by the user, into the full company name (e.g., typing "RD" in an email is immediately converted to "Royal Dutch Petroleum").

The user interface taught by *Thompson* cannot modify the Name conversion software described in *Beauregard* such that the Name conversion software has ability to select "one of a plurality of reference material sources based upon the request for information." The user interface described in *Thompson* allows a user to run keyword searches for medical databases related to the keyword. For example, if the user types in "cold" in the user interface and selects "ADD," the user interface identifies the "Lung Diseases, Obstructive" database, the "common cold" database and the "cold temperature" database. A keyword search user interface cannot modify the Name conversion software such that the Name conversion software has ability to select "one of a plurality of reference material sources based upon the request for information." Therefore, Applicants respectfully suggest that the system recited in claim 11 is not obvious over the combination of *Beauregard* and *Thompson*. Because claim 20 depends from claim 11, claim 20 is also not obvious over the combination of *Beauregard* and *Thompson*, and Applicants request that the Examiner remove this rejection.

Thompson in view of *Wordworks*, and further in view of *Uyehara*

Claims 23-24 have been withdrawn from this application. Therefore, Applicants respectfully request that the Examiner remove this rejection.

Additional Remarks

Based on the above amendments and these remarks, reconsideration of Claims 1-2, 4-7, 9-11 13-14 and 16-22 is respectfully requested.

The Examiner's prompt attention to this matter is greatly appreciated. Should further questions remain, the Examiner is invited to contact the undersigned agent by telephone.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 501826 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: _December 14, 2007_____   By: _____/Scott D. Sanford/_____

Scott D. Sanford

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